

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

June 15, 2021

**Via ECF**

The Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Robert Berry*, 20 CR 72 (JMF)**

Dear Judge Furman:

I write with the consent of both Pretrial Services and the government to request a modification of Mr. Berry's bail conditions to allow him to travel to the U.S. Virgin Islands to spend time with his family before he begins his sentence on this matter. Mr. Berry would like to leave New York on June 25, 2021, and return on July 8, 2021. Mr. Berry will reside with his parents, Caron and Robert Berry, Sr., and will spend time with his sisters and infant niece.

Mr. Berry has been sentenced to 18 months, and has a surrender date of September 9, 2021. He has done extremely well under the supervision of Pretrial Services, and has been compliant with all mandates set forth by the Court. Despite the challenges of the pandemic, Mr. Berry has maintained employment, and is currently working on a construction site in Times Square. His Pretrial Services officer, Ms. Dominique Jackson, reports that Mr. Berry communicates regularly with her, and expressed that Mr. Berry could benefit from some time spent with family. Mr. Berry has also traveled while under supervision. Last March he attended his grandmother's funeral in Houston. That trip occurred without incident, and Mr. Berry remained in contact with me and his Pretrial Services officer while traveling.

Thank you for your consideration of this application.

Application GRANTED on consent. Mr. Berry shall provide his itinerary and contact information to Pretrial Services in advance. The Clerk of Court is directed to terminate Docket No. 55. SO ORDERED.

Cc:  JUSA Brett Kalikow (via ECF)

June 16, 2021

Respectfully submitted,



Tamara L. Giwa  
Counsel for Mr. Berry  
(917) 890-9729